

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

BRYAN REPETTO,)	
)	
Plaintiff)	
)	
v.)	Civil Action No. 08-CV-101
)	
ST. MATTHEW'S UNIVERSITY, INC. and)	
ST. MATTHEWS UNIVERSITY (CAYMAN),)	
LTD.)	
)	
Defendants)	

**AMENDED JOINT MOTION OF THE PARTIES TO ENLARGE TIME, WITH
INCORPORATED MEMORANDUM OF LAW**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff Bryan Repetto and Defendants St. Matthew's University, Inc. and St. Matthew's University (Cayman), Ltd. move this Court to enlarge by three weeks the time provided for Plaintiff's response to Defendant's Motion for Summary Judgment. The grounds for this Motion are as follows:

1. Defendants filed a Motion for Summary Judgment on October 21, 2008, as provided in the Court's Scheduling Order.
2. Plaintiff's Opposition to that Motion currently is due on Tuesday, November 25, 2008.
3. In the period since Defendants filed their Motion, the parties have been engaged in settlement discussions. The Court granted a two-week extension of the deadline for Plaintiff's response in order to allow the parties to pursue these discussions.
4. The parties have reached a settlement in principle, but have not yet agreed on final language for the settlement agreement. In particular, the parties have agreed to a settlement

amount, and to certain elements of non-monetary relief, and have circulated a draft agreement, but have not yet finalized the settlement agreement language.

5. In order to complete the settlement, the parties jointly request a 10 day enlargement of time, until Friday, December 5th, for Plaintiff's response to Defendants' Motion for Summary Judgment. This extension will allow the parties to finalize their agreements and complete the necessary paperwork that ultimately will result in the dismissal of this matter.

WHEREFORE, the parties respectfully request that this Court enlarge the time for filing Plaintiff's Opposition to Defendants' Motion for Summary Judgment by 10 days, until December 5, 2008.

Dated: November 25, 2008

/s/ Barbara L. Goodwin
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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2008, I electronically filed the following document(s):

- 1) AMENDED JOINT MOTION OF THE PARTIES TO ENLARGE TIME, WITH INCORPORATED MEMORANDUM OF LAW

with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

GAIL CORNWALL, ESQ. – gcornwall@eapdlaw.com

and I hereby certify that on November 25, 2008, I mailed by U.S. Postal Service, the document(s) to the following non-registered participants:

None.

/s/ Barbara L. Goodwin
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